IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:

Bankruptcy No. 18-16107-mdc

JOSEPH P. KENNEDY

Chapter 13

Debtor,

Related to Document No. 40

SPECIALIZED LOAN SERVICING, LLC, AS SERVICER FOR BEAR STEARNS ARM TRUST 2005-9, MORTGAGE-BACKED NOTES, SERIES 2005-9, U.S. BANK NATIONAL ASSOCIATION, AS INDENTURE TRUSTEE,

Movant,

V.

JOSEPH P. KENNEDY, LISA F. KENNEDY aka LISA FERRIE KENNEDY, and WILLIAM C. MILLER, Chapter 13 Trustee

Respondents.

NOTICE OF MOTION, RESPONSE DEADLINE, AND HEARING DATE

Specialized Loan Servicing, LLC, as servicer for Bear Stearns ARM Trust 2005-9, Mortgage-Backed Notes, Series 2005-9, U.S. Bank National Association, as Indenture Trustee filed a Motion for Relief from the Automatic Stay and Co-Debtor Stay with the Court to lift the automatic stay and codebtor stay regarding 3 Whisper Lane, Malvern, PA 19355.

<u>Your rights may be affected.</u> You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before Monday, April 15, 2019, you or your attorney must do **all** of the following:
 - (a) file an answer explaining your position at:

Clerk, U.S. Bankruptcy Court 900 Market Street, Suite 400 Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and (b) mail a copy to the movant's attorneys:

Keri P. Ebeck, Esquire Bernstein-Burkley, P.C. Suite 2200, Gulf Tower Pittsburgh, PA 15219

- 2. If you or your attorney do not take these steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
- 3. A hearing on the motion is scheduled to be held before the Honorable Magdeline D. Coleman on **April 30, 2019 at 10:30 A.M.** in Courtroom 2, United States Bankruptcy Court, 900 Market Street, Suite 400, Philadelphia, PA 19107.
- 4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

By: /s/ Keri P. Ebeck Keri P. Ebeck, Esq. PA I.D. #91298 kebeck@bernsteinlaw.com Suite 2200, Gulf Tower Pittsburgh, PA 15219 Phone (412) 456-8112 Fax: (412) 456-8135

Counsel for Specialized Loan Servicing, LLC, as servicer for Bear Stearns ARM Trust 2005-9, Mortgage-Backed Notes, Series 2005-9, U.S. Bank National Association, as Indenture Trustee

Dated: March 28, 2019